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January 8, 2019

**VIA CM/ECF**

The Honorable Alan S. Trust  
United States Bankruptcy Court  
Eastern District of New York  
Alfonse D'Amato Federal Courthouse  
290 Federal Plaza, Courtroom 960  
Central Islip, New York 11722

**Re: *In re Constellation Healthcare Technologies, Inc. and New York Network Management, L.L.C. v. Kevin Kelly and Edel Kelly* (Adv. Pro. No. 18-08155-AST) and (Adv. Pro. No. 18-08154-AST)**

Dear Judge Trust:

On behalf of Constellation Healthcare Technologies, Inc. and New York Network Management, L.L.C. (together, the “Debtors”), this letter serves as notice to interested parties that a ruling conference on the Debtors’ *Motion for Summary Judgment Seeking Mandatory Subordination of Claims Under 11 U.S.C. § 510(b) (Proof of Claim Nos. 113, 114, 254, 255, 268, 269)* (the “Summary Judgment Motion”) [D.I. 3] filed in the above-captioned adversary proceedings (the “Adversary Proceedings”) will be held on **Tuesday, February 5, 2019 at 11:00 a.m. (EST)** at the United States Bankruptcy Court for the Eastern District of New York, Conrad B. Duberstein U.S. Courthouse, 271-C Cadman Plaza East, Courtroom 2554, Brooklyn, NY 11201.

Kevin Kelly and Edel Kelly, the Defendants in the Adversary Proceedings (the “Defendants”), may file any responses to the Summary Judgment Motion no later than **January 18, 2019**. Any replies to any responses shall be filed by **January 25, 2019**, after which time the Summary Judgment Motion shall be on submission with the Court.

The Debtors will serve a copy of this notice on counsel to the Defendants.



A copy of the Summary Judgment Motion, as well as copies of all other documents filed in the above-captioned Adversary Proceedings, may be obtained from (i) the Court's website at <http://www.nyeb.uscourts.gov/> by obtaining a PACER login and password from the Court's website (a PACER password is obtained by accessing the PACER website at: <http://pacer.psc.uscourts.gov>); and (ii) at no cost on the following website maintained by the Debtors: <http://dm.epiq11.com/orionhealthcorp>.

Respectfully submitted,

**DLA Piper LLP (US)**

/s/ Thomas R. Califano

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